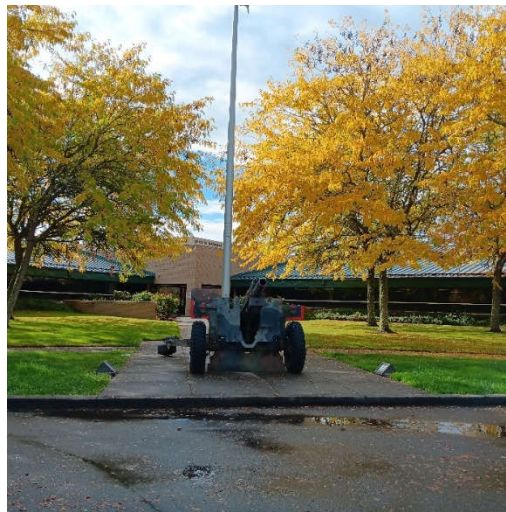


Annual Lead Sampling Report

Forest Grove Armory
2950 Taylor Way
Forest Grove, OR 97116
CIV Ronald Mantle

Date of Inspection: 10/21/2024

Date of Report: 11/18/2024



Prepared For:

National Guard Bureau West Region Industrial Hygiene Office
10510 Superfortress Avenue, Suite C
Mather, CA 95655
Mr. Kenneth A. Forsythe



38900 West Huron River Drive
Romulus, MI 48174
734-955-6600
www.2etc.com

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Executive Summary

Lead dust sampling was conducted inside the Army National Guard (ARNG) Armory located at 2950 Taylor Way, Forest Grove, OR 97116 (Forest Grove Armory) to determine lead accumulation levels on surfaces within the facility. The current ARNG surface wipe threshold for Readiness Centers (RCs) is 10 micrograms per square foot ($\mu\text{g}/\text{ft}^2$).

A total of twenty-eight (28) samples were collected throughout the armory following ASTM sampling protocol. All surface sample results are summarized in the Dust Wipe Results table.

All lead dust wipe samples results were less than 10 $\mu\text{g}/\text{ft}^2$.

Standard/Evaluation Criteria

Although the Occupational Safety and Health Administration (OSHA) has not published exposure standards for lead surface contamination, 29 Code of Federal Regulations (CFR) 1910, Part 1025(h)(1) states that surfaces must be kept “as free as practicable of accumulations of lead” (Reference 1).

Additionally, 40 CFR 745.65(b) defines an acceptable maximum surface level for lead of 10 micrograms per square foot ($\mu\text{g}/\text{ft}^2$) on floors (Reference 2). Both the U.S. Environmental Protection Agency (EPA) and the U.S. Department of Housing and Urban Development (HUD) utilize the less than 10 $\mu\text{g}/\text{ft}^2$ as the Federal threshold for lead contamination in dust for risk assessment and clearance testing for residential buildings or child-occupied facilities.

Because Soldiers' families and the general public are welcomed into the ARNG Armories and RCs for various functions and activities, ARNG Industrial Hygiene has determined that the aforementioned less than 10 $\mu\text{g}/\text{ft}^2$ threshold shall apply to all publicly accessible areas in RCs [Reference 3, paragraph 3d(4)]. Such areas may include, but are not limited to Recruiting Offices, Family Readiness Centers, kitchens, and associated facilities (pantries, dining rooms, and sculleries), clubs, museums, gymnasiums and other athletic facilities, Veterans' Affairs Offices, drill halls, garages, entrance foyers, classrooms, conference rooms, stairwells, landings, and any spaces leased to any member of the public, including contractors.

Thus, the ARNG state leadership responsible for this facility can set limitations on public and family member access to RCs based upon lead surface wipe sample results equal to or exceeding 10 $\mu\text{g}/\text{ft}^2$ (Reference 3).

General Description of Work Performed

According to the information provided by the ARNG, this facility previously had an indoor firing range (IFR). The indoor firing range has been closed and is currently used for storage. At the time of sampling activities, the facility consisted of a family readiness center, a regimental room, a kitchen, a library, a computer room, a recruiter's office, a storage room, and a drill hall.

The samples were collected on October 21, 2024, by Tammy Wall, an EPA Accredited Lead Based Paint Inspector. The sampling protocol was in accordance with ASTM E1728, 2020. The samples were submitted under chain of custody to Accurate Analytical Testing in Romulus, Michigan for analysis by EPA Method 7000B/3050B. A copy of the laboratory report and chain of custody record is attached. The results are summarized in the following table:

Dust Wipe Results

Sample ID	Room/Area	Surface Tested	Lead Concentration in $\mu\text{g}/\text{ft}^2$
OR FORE 01	Field Blank	N/A	N/D
OR FORE 02	IFR	N Wall, Left	<5.00
OR FORE 03	IFR	W Wall, Right	<5.00
OR FORE 04	IFR	W Wall, Left	<5.00
OR FORE 05	IFR	S Wall, Right	<5.00
OR FORE 06	IFR	Floor, W End	5.89
OR FORE 07	IFR	S Wall, Left	6.75
OR FORE 08	IFR	E Wall, Right	6.10
OR FORE 09	IFR	E Wall, Left	<5.00
OR FORE 10	IFR	N Wall, Right	7.09
OR FORE 11	Field Blank	N/A	N/D
OR FORE 12	IFR	Floor, E End	<5.00
OR FORE 13	Drill Hall	Floor, Outside IFR	<5.00
OR FORE 14	Family Readiness Center	Carpeted Floor, by Door	<5.00
OR FORE 15	Family Readiness Center	Desk	<5.00
OR FORE 16	Regimental Room	Carpeted Floor, Center	<5.00
OR FORE 17	Regimental Room	Table	<5.00
OR FORE 18	Drill Hall	Floor, Center	<5.00
OR FORE 19	Drill Hall	Floor, by Bay Door	<5.00
OR FORE 20	Kitchen	Floor, by Door	<5.00
OR FORE 21	Field Blank	N/A	N/D
OR FORE 22	Kitchen	Counter	<5.00
OR FORE 23	Library	Floor, by Door	<5.00
OR FORE 24	Library	Desk	<5.00
OR FORE 25	Computer Room	Carpeted Floor, by Door	<5.00
OR FORE 26	Computer Room	Desk	<5.00
OR FORE 27	Recruiter's Office	Carpeted Floor, by Door	<5.00
OR FORE 28	Recruiter's Office	Desk	<5.00

5 = Reporting Limit; Bold Indicates Lead Levels 10 $\mu\text{g}/\text{ft}^2$ or above; $\mu\text{g}/\text{ft}^2$ = microgram per square foot;
 N/A = Not Applicable; N/D = Not Detected

Conclusions/Recommendations

All lead levels were below the required limit, of 10 $\mu\text{g}/\text{ft}^2$. To maintain all surfaces as free as practicable of lead accumulation, we recommend:

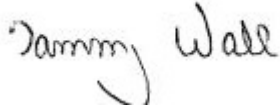
1. The facility should implement housekeeping practices to have areas cleaned following the guidance detailed in the ARNG Lead Cleaning Work Practices (RAC 5).
2. Prohibit weapons cleaning inside all areas of the armory, along with storage of uncleaned materials previously used at weapons qualification ranges.
3. Prohibit activities that could disturb coated flooring and walls inside the converted IFR.
4. Inspect the walls and flooring for damage to the encapsulant in the converted IFR. If damage is observed, reapply the encapsulant in accordance with Pam 420-15.

References

1. Title 29, Code of Federal Regulations (CFR), Part 1910, Occupational Safety and Health Administration (OSHA), current Edition.
2. Title 40 CFR, Part 745, as amended, Environmental Protection Agency (EPA).
3. NGB Industrial Hygiene Memo. SUBJECT: Army National Guard Industrial Hygiene Lead Dust Hazard Guidance, 30 August 2023.
4. Army National Guard Pamphlet (NG Pam) 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
5. Lead Cleaning Standard Operating Procedure (SOP), ARNG Industrial Hygiene Program, 2020.
6. American Society for Testing and Materials (ASTM) Standard E1728, "Standard Practice for Collection of Settled Dust Samples Using Wipe Sampling Methods for Subsequent Lead Determination," ASTM International, West Conshohocken, PA, www.astm.org, 10 January 2020.
7. ASTM Standard E1792, "Standard Specification for Wipe Sampling Materials for Lead in Surface Dust," ASTM International, West Conshohocken, PA, www.astm.org, 29 September 2020.
8. Department of Defense (DoD) Directive (DoDD) 4715.1E, Environment, Safety, and Occupational Health (ESOH), Incorporating Change 1, 31 August 2018.
9. DoD Instruction (DoDI) 6055.01 Subject: DoD Safety and Occupational Health (SOH) Program, Incorporating Change 3, 21 April 2021.
10. Department of the Army Pamphlet (DA-PAM) 40-503, The Army Industrial Hygiene Program, 2 April 2013.
11. Army National Guard Pamphlet (NG Pam) 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.

Contractor Certification

The information contained in this report is a true and accurate representation of the conditions within this facility at the time of lead testing, based on the professional judgement of the person(s) who conducted and reported this testing.



Tammy Wall

Date: October 21, 2024

Contractor E-Mail: Tammy.Wall@2etc.com

Laboratory Used & Lab Results

Accurate Analytical Testing
30105 Beverly Road, Romulus, MI 48174
Phone #: 734-699-5227



30105 Beverly Road
Romulus, MI 48174
Ph: 734-629-8161; Fax: 734-629-8431

Certificate of Analysis: Lead In Dust Wipe by EPA Method 7000B/NIOSH 7082*

Client : Environmental Testing and Consulting R
38900 Huron River Drive
Romulus, MI 48174

Attn : ETC **Email :** labresults@2etc.com
Phone : 734-955-6600 **Fax :** 734-955-6604

AAT Project : 1082236
Sampling Date : 10/21/2024
Date Received : 10/24/2024
Date Analyzed : 10/26/2024
Date Reported : 10/28/2024

Client Project : 272961

Project Location : 2950 Taylor Way, Forest Grove, OR 97116

Sample ID	Client Code	Sample Description	Length (inch)	Width (inch)	Area (Sq ft)	Results Lead µg/ft2 *
9839591	OR-FORE-01	NA Field Blank	N/A	N/A	N/A	N/D
9839592	OR-FORE-02	IFR North Wall, Left	12	12	1.00	<5.00
9839593	OR-FORE-03	IFR West Wall, Right	12	12	1.00	<5.00
9839594	OR-FORE-04	IFR West Wall, Left	12	12	1.00	<5.00
9839595	OR-FORE-05	IFR South Wall, Right	12	12	1.00	<5.00
9839596	OR-FORE-06	IFR Floor, West	12	12	1.00	5.89
9839597	OR-FORE-07	IFR South Wall, Left	12	12	1.00	6.75
9839598	OR-FORE-08	IFR East Wall, Right	12	12	1.00	6.10
9839599	OR-FORE-09	IFR East Wall, Left	12	12	1.00	<5.00
9839600	OR-FORE-10	IFR North Wall, Right	12	12	1.00	7.09
9839601	OR-FORE-11	NA Field Blank	N/A	N/A	N/A	N/D
9839602	OR-FORE-12	IFR Floor, East	12	12	1.00	<5.00
9839603	OR-FORE-13	Drill hall Floor Outside IFR	12	12	1.00	<5.00
9839604	OR-FORE-14	Family Readiness Center Floor By Door, Carpet	12	12	1.00	<5.00
9839605	OR-FORE-15	Family Readiness Center Desk	12	12	1.00	<5.00

ND = Not Detected, N/A = Not Available, RL = Reporting Limit, Analytical Reporting Limit is 5 ug/sample. For true values assume (3) significant figures. AAT internal SOP S205. The method and batch QC are acceptable unless otherwise stated. EPA Regulatory Limits: 10 ug/ft2 (Floors, Carpeted/Uncarpeted), 100 ug/ft2 (Window Sill/Stools), 400 ug/ft2 (Window Trough/Well/Ext Concrete Surfaces). HUD Grantee Regulatory Limits: 10 ug/ft2 (Interior Floors), 40 ug/ft2 (Porch Floors), 100 ug/ft2 (Window Sills), 100 ug/ft2 (Window Troughs). The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA-LAP and NY State DOH ELAP programs. These results are submitted pursuant to AAT, LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted. All Quality Control requirements for the samples this report contains have been met. AAT does not blank correct reported values. Sample data apply only to items analyzed. Results are calculated with wipe dimensions supplied by client. Reproduction of this document other than in its entirety is not authorized by AAT, LLC. * = Validated modified method. Samples are stored for 15 days following report date.



AIHA LAP- Lab ID #100986, NY State DOH ELAP -Lab ID #11864, State of Ohio- Lab ID # 10042

Date Printed: 10/28/2024

AAT Project: 1082236

Sample ID	Client Code	Sample Description	Length (inch)	Width (inch)	Area (Sq ft)	Results Lead $\mu\text{g}/\text{ft}^2$ *
9839606	OR-FORE-16	Regimental room Floor, Center, Carpet	12	12	1.00	<5.00
9839607	OR-FORE-17	Regimental Room Table	12	12	1.00	<5.00
9839608	OR-FORE-18	Drill hall Floor, Center	12	12	1.00	<5.00
9839609	OR-FORE-19	Drill hall Floor By Bay Door	12	12	1.00	<5.00
9839610	OR-FORE-20	Kitchen Floor By Door	12	12	1.00	<5.00
9839611	OR-FORE-21	NA Field Blank	N/A	N/A	N/A	N/D
9839612	OR-FORE-22	Kitchen Counter	12	12	1.00	<5.00
9839613	OR-FORE-23	Library Floor By Door	12	12	1.00	<5.00
9839614	OR-FORE-24	Library Desk	12	12	1.00	<5.00
9839615	OR-FORE-25	Computer room Floor By Door, Carpet	12	12	1.00	<5.00
9839616	OR-FORE-26	Computer room Desk	12	12	1.00	<5.00
9839617	OR-FORE-27	Recruiter's Floor By Door, Carpet	12	12	1.00	<5.00
9839618	OR-FORE-28	Recruiter's Desk	12	12	1.00	<5.00

Analyst Signature

Zachary St John

ND = Not Detected, N/A = Not Available, RL = Reporting Limit, Analytical Reporting Limit is 5 ug/sample. For true values assume (3) significant figures. AAT Internal SOP S205. The method and batch QC are acceptable unless otherwise stated. EPA Regulatory Limits: 10 ug/ft² (Floors, Carpeted/Uncarpeted), 100 ug/ft² (Window Sill/Stools), 400 ug/ft² (Window Trough/Well/Ext Concrete Surfaces). HUD Grantee Regulatory Limits: 10 ug/ft² (Interior Floors), 40 ug/ft² (Porch Floors), 100 ug/ft² (Window Sills), 100 ug/ft² (Window Troughs). The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA-LAP and NY State DOH ELAP programs. These results are submitted pursuant to AAT, LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted. All Quality Control requirements for the samples this report contains have been met. AAT does not blank correct reported values. Sample data apply only to items analyzed. Results are calculated with wipe dimensions supplied by client. Reproduction of this document other than in its entirety is not authorized by AAT, LLC. * = Validated modified method. Samples are stored for 15 days following report date.



AIHA LAP- Lab ID #100986, NY State DOH ELAP -Lab ID #11864, State of Ohio- Lab ID # 10042

Date Printed: 10/28/2024

AAT Project: 1082236



30105 Beverly Road
Romulus, MI 48174
Ph: 734-629-8161; Fax: 734-629-8431

To : Environmental Testing and Consulting R
38900 Huron River Drive
Romulus, MI 48174

Attn : ETC

Email : labresults@2etc.com

Phone : 734-955-6600

Project Location : 2950 Taylor Way, Forest Grove, OR 97116

AAT Project : 1082236

Client Project : 272961

Date Reported : 10/28/2024

Sample	Client Code	Analysis Requested	Completed	Analyst
9839591	OR-FORE-01	Dust Wipe	10/26/2024	Zachary St John
9839592	OR-FORE-02	Dust Wipe	10/26/2024	Zachary St John
9839593	OR-FORE-03	Dust Wipe	10/26/2024	Zachary St John
9839594	OR-FORE-04	Dust Wipe	10/26/2024	Zachary St John
9839595	OR-FORE-05	Dust Wipe	10/26/2024	Zachary St John
9839596	OR-FORE-06	Dust Wipe	10/26/2024	Zachary St John
9839597	OR-FORE-07	Dust Wipe	10/26/2024	Zachary St John
9839598	OR-FORE-08	Dust Wipe	10/26/2024	Zachary St John
9839599	OR-FORE-09	Dust Wipe	10/26/2024	Zachary St John
9839600	OR-FORE-10	Dust Wipe	10/26/2024	Zachary St John
9839601	OR-FORE-11	Dust Wipe	10/26/2024	Zachary St John
9839602	OR-FORE-12	Dust Wipe	10/26/2024	Zachary St John
9839603	OR-FORE-13	Dust Wipe	10/26/2024	Zachary St John
9839604	OR-FORE-14	Dust Wipe	10/26/2024	Zachary St John
9839605	OR-FORE-15	Dust Wipe	10/26/2024	Zachary St John
9839606	OR-FORE-16	Dust Wipe	10/26/2024	Zachary St John
9839607	OR-FORE-17	Dust Wipe	10/26/2024	Zachary St John
9839608	OR-FORE-18	Dust Wipe	10/26/2024	Zachary St John
9839609	OR-FORE-19	Dust Wipe	10/26/2024	Zachary St John
9839610	OR-FORE-20	Dust Wipe	10/26/2024	Zachary St John
9839611	OR-FORE-21	Dust Wipe	10/26/2024	Zachary St John
9839612	OR-FORE-22	Dust Wipe	10/26/2024	Zachary St John
9839613	OR-FORE-23	Dust Wipe	10/26/2024	Zachary St John
9839614	OR-FORE-24	Dust Wipe	10/26/2024	Zachary St John
9839615	OR-FORE-25	Dust Wipe	10/26/2024	Zachary St John
9839616	OR-FORE-26	Dust Wipe	10/26/2024	Zachary St John
9839617	OR-FORE-27	Dust Wipe	10/26/2024	Zachary St John

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Sample	Client Code	Analysis Requested	Completed	Analyst
9839618	OR-FORE-28	Dust Wipe	10/26/2024	Zachary St John



Reviewed By

Elyse Bidle
Quality Assurance Coordinator

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Submitting Company :

Environmental Testing and Consulting R
38900 Huron River Drive
Romulus, MI - 48174

AAT Project : 1082236

Turn Around: 48 Hours

Project Location: 2950 Taylor Way, Forest Grove, OR 97116

Client Job: 272961

Lab Sample	Sample Description	Barcode	Client Code	Sample Type	Dimension	Field Blank	Other Analysis
9839591	N/A Field Blank	1710848	OR-FORE-01	Dust Wipe	0 x 0	Yes	None
9839592	IFR North Wall, Left	1710849	OR-FORE-02	Dust Wipe	12 x 12	No	None
9839593	IFR West Wall, Right	1710850	OR-FORE-03	Dust Wipe	12 x 12	No	None
9839594	IFR West Wall, Left	1710851	OR-FORE-04	Dust Wipe	12 x 12	No	None
9839595	IFR South Wall, Right	1710852	OR-FORE-05	Dust Wipe	12 x 12	No	None
9839596	IFR Floor, West	1710853	OR-FORE-06	Dust Wipe	12 x 12	No	None
9839597	IFR South Wall, Left	1710854	OR-FORE-07	Dust Wipe	12 x 12	No	None
9839598	IFR EAsT Wall, Right	1710855	OR-FORE-08	Dust Wipe	12 x 12	No	None
9839599	IFR EAsT Wall, Left	1710856	OR-FORE-09	Dust Wipe	12 x 12	No	None
9839600	IFR North Wall, Right	1710857	OR-FORE-10	Dust Wipe	12 x 12	No	None
9839601	N/A Field Blank	1710858	OR-FORE-11	Dust Wipe	0 x 0	Yes	None

Lab Sample	Sample Description	Barcode	Client Code	Sample Type	Dimension	Field Blank	Other Analysis
9839602	IFR Floor, East	1710859	OR-FORE-12	Dust Wipe	12 x 12	No	None
9839603	Drill hall Floor Outside IFR	1710860	OR-FORE-13	Dust Wipe	12 x 12	No	None
9839604	Readiness Center Floor By Door,	1710861	OR-FORE-14	Dust Wipe	12 x 12	No	None
9839605	Family Readiness Center Desk	1710862	OR-FORE-15	Dust Wipe	12 x 12	No	None
9839606	Regimental room Floor, Center, Car	1710863	OR-FORE-16	Dust Wipe	12 x 12	No	None
9839607	Regimental Room Table	1710864	OR-FORE-17	Dust Wipe	12 x 12	No	None
9839608	Drill hall Floor, Center	1710865	OR-FORE-18	Dust Wipe	12 x 12	No	None
9839609	Drill hall Floor By Bay Door	1710866	OR-FORE-19	Dust Wipe	12 x 12	No	None
9839610	Kitchen Floor By Door	1710867	OR-FORE-20	Dust Wipe	12 x 12	No	None
9839611	N/A Field Blank	1710868	OR-FORE-21	Dust Wipe	0 x 0	Yes	None
9839612	Kitchen Counter	1710869	OR-FORE-22	Dust Wipe	12 x 12	No	None
9839613	Library Floor By Door	1710870	OR-FORE-23	Dust Wipe	12 x 12	No	None
9839614	Library Desk	1710871	OR-FORE-24	Dust Wipe	12 x 12	No	None
9839615	Computer room Floor By Door, Car	1710872	OR-FORE-25	Dust Wipe	12 x 12	No	None
9839616	Computer room Desk	1710873	OR-FORE-26	Dust Wipe	12 x 12	No	None
9839617	Recruiter's Floor By Door, Ca	1710874	OR-FORE-27	Dust Wipe	12 x 12	No	None
9839618	Recruiter's Desk	1710875	OR-FORE-28	Dust Wipe	12 x 12	No	None



Sampled By: Tammy Wall



Received By: Hannah Black

Received Date: 10/24/2024 16:54

A handwritten signature in blue ink, identified as Zachary St John.

Analyst: Zachary St John

A handwritten signature in blue ink, identified as Elyse Bidle.

Relinquished By: Elyse Bidle

Relinquished Date: 10/28/2024 07:51

Seal Intact: Yes

Preservative (if required): Yes

Containers Labeled : Yes

2950 Taylor Way
Forest Grove, OR 97116

ETC Job # 272961

Wipe Sampling Project - Field Data Sheet

Notes:

*IFR Currently used as:

Storage

State/District: OR RC Location (city/name): Forest Grove/Forest Grove Armory Sampling Date: 10/21/24
Sampling Performed By: Tammy Wall Team member #1: Civilian Ronald Mantle
Team #1 phone #: 971 555 8139 Team #1 email: Ronald.B.Mantle@army.mil
Team member #2: _____ Phone: _____ Email: _____

Status of IFR at this RC: ☐ Active, ☐ Nonfunctional (closed/not cleaned), ☒ Closed (cleaned)
☐ Disposed, ☐ Unknown ☐ Never had one

Rooms used by the public: Drill hall
Rooms within RC: ☐ Family Readiness Office ☒ Kitchen ☒ Breakroom ☒ Drill Hall

Sample ID (XX XXXX #)	Room/Area	Surface (Wall, Floor, etc)
OR FORE 01	Field blank	
OR FORE 02	IFR	North Wall Left
OR FORE 03	IFR	West Wall Right
OR FORE 04	IFR	West Wall Left
OR FORE 05	IFR	South Wall Right
OR FORE 06	IFR	Floor West
OR FORE 07	IFR	South Wall Left
OR FORE 08	IFR	East Wall Right
OR FORE 09	IFR	East Wall Left
OR FORE 10	IFR	North Wall Right
OR FORE 11	Field blank	
OR FORE 12	IFR	Floor East
OR FORE 13	Family Readiness Center	Floor outside IFR
OR FORE 14	Family Readiness Center	Floor by door carpet
OR FORE 15	Family Readiness Center	Desk
OR FORE 16	Regimental Room	Floor center carpet
OR FORE 17	Regimental Room	Table
OR FORE 18	Drill hall	Floor center
OR FORE 19	Drill hall	Floor by bay door
OR FORE 20	Kitchen	Floor by door
OR FORE 21	Field blank	
OR FORE 22	Kitchen	Counter
OR FORE 23	Library	Floor by door
OR FORE 24	Library	Desk
OR FORE 25	Computer Rm	Floor by door Carpet
OR FORE 26	Computer Rm	Desk
OR FORE 27	Recruiters	Floor by door Carpet
OR FORE 28	Recruiters	Desk

Samples Shipped by: Name: Tammy Wall Signature: Tammy Wall Date: 10/23/24